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March 7, 2018

VIA ECF

Theodore D. Chuang, District Judge
United States District Court, District of Maryland
6500 Cherrywood Lane, Suite 245A
Greenbelt, MD 20770

Re: DISH Network L.L.C. v. Dima Furniture Inc. et al., Civil Action No. 8:17-cv-03817-TDC (D. Md.)

Dear Judge Chuang:

I represent Plaintiffs DISH Network L.L.C. (“DISH”) in the above referenced action against Defendants Dima Furniture Inc. and Mohammad Yusif. DISH submits this letter pursuant to the case management order (Dkt. 10), requiring a pre-motion notice and pre-motion conference prior to filing any motion.

DISH seeks to file a motion for Clerk’s entry of default against Defendants pursuant to Fed. R. Civ. P. 55(a). Defendants were served with DISH’s summons, complaint, and the case management order on January 4, 2018. (Dkts. 11-12.) Service was proper under Fed. R. Civ. P. 4(e)(2)(A) and (4)(h)(1)(B), as established by the process server’s declarations. (*Id.*) The applicable time for responding to the complaint has passed. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

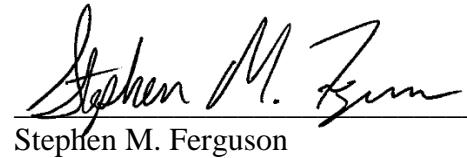
Defendants are represented by Greg Friedman who may be contacted at friedman.g@gmail.com or 301-897-9130. Mr. Friedman requested and Defendants were given extensions of time to answer to February 15, 2018. I emailed Defendants’ counsel on February 27, 2018, informing him that Defendants must file their answer by March 2 or DISH would request entry of default. Mr. Friedman called me on February 27 indicating Defendants would file their answer by March 2. To date, Defendants have not filed an answer or other responsive pleading or requested additional time past March 2.

Dima Furniture Inc. is a Maryland corporation and based on information contained in a Westlaw PeopleMap report, Mr. Yusif is not a minor, incompetent, or exempt under the Servicemembers’ Civil Relief Act. The Clerk should enter default against Defendants.

DISH seeks authorization to file a motion for Clerk’s entry of default against Defendants.

Sincerely,

HAGAN NOLL & BOYLE LLC



Stephen M. Ferguson